

May 7, 2007

B-19J

Mr. Lawrence Blake  
Superintendent  
Dayton Aviation Heritage National Historic Park  
P.O. Box 9280  
Dayton, Ohio 45409

**RE: Comments on the Final General Management Plan Amendment and Environmental Impact Statement (FEIS) for the Dayton Aviation Heritage National Historical Park, Dayton, Ohio, CEQ #20070138**

Dear Mr. Blake:

The United States Environmental Protection Agency (U.S. EPA) has received the document listed above. Under the National Environmental Policy Act (NEPA), the Council on Environmental Quality regulations, and Section 309 of the Clean Air Act, U.S. EPA reviews and comments on major federal actions.

The FEIS continues to support Alternative C as the preferred alternative. There were no significant modifications to Alternative C in the FEIS.

U. S. EPA rated the DEIS as **EC-2, Environmental Concerns-Insufficient Information**. We commented about air quality, wetlands and water quality. We are pleased that the National Park Service (NPS) has included a provision to perform an on-site inspection for wetlands after the final alignment for the road is established. The project area for the road is in an upland area and no wetlands are likely to be discovered. We understand that in the unlikely event that wetlands are discovered, the NPS would realign the road to avoid any wetland impacts. We do have further comments about air quality and water quality.

On page 4 of the addendum to the FEIS, in your response to our comments about air quality, the NPS states:

"The NPS believes the levels of fine particulates (PM<sub>2.5</sub>) would be associated primarily with dust raised by the movement of traffic. Because traffic may be moving somewhat more slowly in the preferred alternative, PM 2.5 levels could be slightly lower in Alternative C than in the no-action alternative. The difference caused by, at most 880 vehicle trips per day would not be measurable and, therefore, would be of negligible intensity."

U.S. EPA disagrees with the statement that levels of PM 2.5 would be associated primarily with dust raised by the movement of traffic. PM 2.5 is directly emitted from vehicles. Diesel truck traffic and other diesel vehicles are of the most concern. Road dust can contribute, but we are primarily concerned with the PM 2.5 that is directly emitted from vehicles. Please reflect this in the Record of Decision. However, we do agree that there is no need for a PM2.5 or CO hotspot analysis. The 880 vehicle trips per day would not make a measurable change in monitored concentrations.

Thank you for the additional information concerning water quality. We appreciate your consideration of permeable surfaces for parking during the preliminary design phase. This project also presents a great opportunity for the NPS to incorporate sustainable development principles into the construction phase by considering the use of diesel construction equipment with controls.

Thank you for giving us the opportunity to review the FEIS/GMP. If there are any questions, please call Julie Guenther, of my staff, at 312-86-3172 or e-mail her at [guenther.julia@epa.gov](mailto:guenther.julia@epa.gov).

Sincerely,

/s/

Kenneth A. Westlake, Chief  
NEPA Implementation Section